

Affidavit

I, Casey T Carty, a Special Agent (SA) with the Federal Bureau of Investigation (FBI), Cleveland Division, being duly sworn, depose and state as follows:

1. I have been employed as a Special Agent of the FBI since April 2004, and am currently assigned to the FBI's Cleveland Division. While employed by the FBI, I have conducted investigations of numerous federal criminal offenses including white collar crimes, crimes against children, violent crimes and narcotics offenses. I have gained experience through training at the FBI Academy and everyday work related to these types of investigations.
2. I am an "investigative or law enforcement officer" of the United States within the meaning of Section 2510(7) of Title 18, United States Code, and empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Section 2516 of Title 18, United States Code.
3. This affidavit is being submitted for the limited purpose of establishing probable cause that Akeem Stafford, age 36, of Elyria, OH has violated Title 21 USC Section 841(a)(1) and (b)(1)(C) [possession with intent to distribute controlled substances]. The statements contained in this affidavit are derived from information provided to me by members of the United States Postal Inspection Service (USPIS), the Lorain Police Department (LPD), as well as my own investigation of this matter. This affidavit does not include every fact known to me regarding this investigation but will seek to summarize relevant information.

Probable Cause

4. On September 15, 2022, while conducting parcel interdiction in Cleveland, OH, U.S. Postal Inspection Service (USPIS) personnel located a parcel addressed to Mike Seabold at 3327 Camden Ave, Lorain, OH 44055. The package displayed a return address in Arizona and was suspected to contain narcotics based on its origin, method of mailing and size. USPIS placed

- the package in a line up along with several blank parcels and deployed a law enforcement canine trained in the detection of narcotic odors to conduct a sniff of the packages. The canine gave a positive alert to the suspect parcel, indicating that it detected the odor of illegal drugs emanating from package.
5. On September 15, 2022, USPIS sought and obtained a federal search warrant authorizing a search of the package and its contents. The warrant was promptly executed and one kilogram of a substance which field tested positive as cocaine was located inside.
 6. During the afternoon hours on September 15, 2022, a team comprised of members of the USPIS, the Lorain Police Department and I conducted a controlled delivery of the package to 3327 Camden Ave. Prior to the delivery, all but approximately 105 grams of cocaine were removed from the package. The package was then outfitted with a GPS tracking device, along with a device to allow investigators to remotely detect when the package was opened. Numerous law enforcement officers and I established surveillance around 3327 Camden Ave. Prior to delivering the package, Akeem Stafford was observed by surveillance to be parked in front of 3327 Camden Ave in a blue Chevrolet Malibu bearing Ohio tag P291876. The residence at 3327 Camden Ave was known by investigators to be the residence of the father of one of Stafford's girlfriends.
 7. At approximately 5:30 p.m. the package was delivered to 3327 Camden Ave by a member of the USPIS. Less than five minutes after the package was left at the residence, Stafford retrieved it, placed it in his vehicle, and drove off from the area. Stafford was the sole occupant of the vehicle.
 8. As he drove from the area, numerous law enforcement vehicles converged on his Malibu and signaled for it to stop with lights and sirens. Stafford failed to comply with the signals to pull over, and led law enforcement on a pursuit through the residential streets in the vicinity

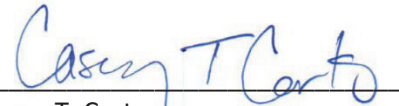
of 3327 Camden Ave. After several minutes of failing to stop his vehicle, Stafford abruptly stopped the car, bailed out on foot, and fled into a wooded area. He was pursued by numerous officers and eventually taken into custody in the woods. While being searched incident to his arrest, officers located 2.5 grams of a substance which field tested positive as fentanyl. When he bailed from the car, Stafford left the package inside. The car and package were both secured by law enforcement.

9. Stafford was transported to the Lorain Police Department where he was interviewed by an LPD Detective and me. At the outset of the interview, he was advised of his rights pursuant to *Miranda*. He indicated he understood his rights, signed a waiver of his rights, and agreed to speak with us. In summary, Stafford provided the following information:
10. Stafford's reason for fleeing from the police was that he knew the package he had picked up contained something illegal. He speculated the package might have contained cocaine, marijuana, cash, or guns, but denied knowing specifically what was inside. He was to be paid \$2500 to pick up the package and deliver it to a location in Lorain by a male whom he identified as "Ricardo Ramon". Stafford met "Ricardo Ramon" when the two were incarcerated at the Federal Correctional Institution at Allentown, PA. "Ricardo Ramon" was from Arizona and was locked up on a drug conspiracy case at the time. Stafford had picked up similar packages almost every day for the past month from addresses in Lorain, Cleveland, Youngstown, and Akron. Stafford claimed to have found the 2.5 grams of fentanyl located in his pocket while walking down the street one day and planned to sell it.
11. Based on the quantity of cocaine seized from the package described above, which is far in excess of what a drug user would possess strictly for personal use, along with Stafford's admission of his intent to sell the 2.5 grams of fentanyl located in his pocket, I believe that Stafford possessed the approximately 105 grams of cocaine which remained in the package

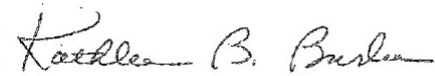
after it was intercepted by law enforcement with the intent to distribute it. Additionally, I believe that Stafford intended to distribute the entire kilogram of cocaine and but for the effort of law enforcement, he would have done so.

Conclusion

12. Based on the preceding, I believe that probable cause exists which indicates that Akeem L. Stafford has violated Title 21 USC Section 841(a)(1) and (b)(1)(C) [possession with intent to distribute controlled substances].



Casey T. Carty
Special Agent
Federal Bureau of Investigation



Kathleen B. Burke, U.S. Magistrate Judge

This affidavit was sworn to by the affiant by telephone after a PDF was transmitted by email, per Crim. R. 41(d)(3) this 16th day of September, 2022.